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8 Attorneys for Plaintiffs, A.H., et al.

6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**

8 A.H., et al.,

Case No.: 5:23-cv-01028-JGB-SHK

9 Plaintiffs,

Assigned to:

10 v.

Hon. District Judge Jesus G. Bernal
Hon. Mag. Judge Shashi H. Kewalramani

12 COUNTY OF SAN BERNARDINO
13 and JUSTIN LOPEZ,

14 Defendants.

**DECLARATION OF RENEE V.
MASONGSONG IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

16 Date: September 23, 2024

17 Time: 9:00 a.m.

18 Crtrm: Courtroom 1

19 3470 Twelfth St.
Riverside, CA 92501

20 [Filed concurrently with Plaintiffs'
21 Exhibits; Plaintiffs' Memorandum of
22 Points and Authorities; Response to
23 Defendants' Statement of Genuine
Disputes of Material Fact and
Declaration of Roger A. Clark]

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DECLARATION OF RENEE V. MASONGSONG

I, Renee V. Masongsong, hereby declare as follows:

1. I am an attorney duly licensed to practice law in the State of California and the United States District Court for the Central District of California. I am one of the attorneys of record for Plaintiffs A.H., H.H., C.H., and Patricia Holland. I make this declaration in support of the Plaintiffs' Opposition to Defendants' Motion for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

9 2. Attached hereto as **Exhibit “1”** is a true and correct copy of the relevant
10 portions of the Deposition of Justin Lopez, as taken on April 11, 2024.

11 3. Attached hereto as **Exhibit “2”** is a true and correct copy of the relevant
12 portions of the Deposition of Kristopher Hillebrand, as taken on June 25, 2024.

13 4. Attached hereto as **Exhibit “3”** is a true and correct copy of the relevant
14 portions of the Deposition of Mark Rios, as taken on June 25, 2024.

15 5. Attached hereto as **Exhibit “4”** is a true and correct copy of the relevant
16 portions of the Deposition of Phillip L. Sanchez, as taken on August 21, 2024.

17 6. Attached hereto as **Exhibit “5”** is a true and correct copy of relevant
18 portions of the transcript of Justin Lopez’s belt recording, which Defendants have also
19 filed as their “Exhibit F” in support of their Motion for Summary judgment.

I declare under penalty of perjury under that the foregoing that the foregoing is true and correct. Executed on August 30, 2024.

s/Renee V. Masongsong

Renee V. Masongsong